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1 Q. What do you mean "the volume"?

2 A. You know, that it would affect
3 the whole world.

4 Q. Okay. And so when did you first
5 learn about a reduction in force?

6 A. When I came back from vacation.
7 So I got back from vacation, I think it was, like,
8 March the 7th or 8th.

9 Q. Okay. Tell me about that.

10 A. I was just told that we were
11 looking at essential versus nonessential, and that
12 I'd receive a list of the -- who would be termed.

13 Q. Okay. And who told you that?

14 A. That came from, I believe,
15 Heather.

16 Q. Heather, who?

17 A. Kinder.

18 Q. And how did it come to you?

19 A. Just word of mouth.

20 Q. Well, did she tell -- did it come
21 out of her, Ms. Kinder's mouth that there would be
22 --

23 A. I don't remember. I'm just
24 saying, I -- you know, my main point of contact
25 was with Heather.

1 Q. All right. Do you have -- do you
2 recall having any, like, login credentials under,
3 like, Indeed.com or any other websites where
4 individuals look for job postings?

5 A. I don't remember having any other
6 sign-ins for other job career posting sites.

7 Q. What was your understanding of
8 nonessential versus essential employees at Tri
9 Star?

10 A. I really do not have -- did not
11 have an understanding about that, because that
12 wasn't a decision that I played a part in.

13 Q. So if you're not involved in --
14 with the decision, you did have involv- --
15 involvement after the decision had been made; is
16 that fair?

17 A. Yes.

18 Q. Okay. And one of the things
19 you've described is, like, keeping track of
20 certain information; is that fair?

21 A. Yes.

22 Q. And you collaborated with Ms.
23 Kinder in how to -- to track that information?

24 A. Yes.

25 Q. What was your understanding of

1 tell?

2 A. I would assume it means the day
3 that the approval was given.

4 Q. Approval for what, though?

5 A. Based on this sheet, I guess, for
6 their status.

7 Q. Okay. To work from home?

8 A. I'm not sure.

9 Q. Okay. Next column, "Policy
10 Signed," what is the policy to be signed, do you
11 recall?

12 A. There was a, I think it was the
13 laptop sign-out sheet that I remember, if somebody
14 was being assigned a lapsho- -- a laptop, that
15 they needed to sign. But I don't recall if that
16 was the only document or not.

17 Q. Okay. Because if you look at the
18 next column, it says "Letter Signed," right?

19 A. Uh-huh.

20 Q. What is -- what is your
21 recollection of "Letter Signed"?

22 A. That laptop-issued document that
23 I was just referring to.

24 Q. Okay. So what's the -- so it's
25 both -- it's your recollection, right, sitting

1 Q. Was there anything particular on
2 that website with reference to how to complete
3 these in the context of a reduction in force or
4 layoffs?

5 A. I don't remember. I made the --
6 I made the selection that was -- is most accurate
7 based on what was going on, in my opinion.

8 Q. Okay. What is your underst- --
9 what is your understanding of the difference
10 between "lack of work" and "discharge"?

11 A. Well, because it was
12 nonessential, her job function, as I remember it,
13 it was because we didn't have work for
14 nonessential employees based on the needs of the
15 business.

16 Q. Okay. And did you under- -- and
17 who gave -- who informed you that Ms. Andrews was
18 -- who did you rely upon for that?

19 A. The -- the list that I got, or
20 whatever. The notification I received as to who
21 was being discharged, whose roles were being
22 eliminated. And that would have ultimately come
23 from Lou.

24 Q. Okay. Those are all the
25 questions I have for you. Thank you.